

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION V

DATE: **5** MAR 1986

EPA Region 5 Records Ctr.



349587

SUBJECT: Federal Multimedia Inspection
Glenview Naval Air Station (GNAS)
Glenview, Illinois

FROM: *Willie H. Harris*
Willie H. Harris, Chief
Central District Office (5SCDO)

TO: William D. Franz, Chief
Environmental Review Branch (5ME)

On February 25-26, 1986, a multimedia inspection was conducted at the subject Federal Facility.

The multimedia inspection consisted of CWA, CAA and RCRA inspections. The Facility discharges only sanitary wastes into the sewer system which is a part of the Metropolitan Sanitary District of Chicago. Other pertinent information and findings of the inspections are included in the attached reports.

If you have any questions about these inspections, please call me at 886-5500.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

DATE: **5** MAR 1986

SUBJECT: Air Inspection, Glenview Naval Air Station
Glenview, Illinois (4-C246) (A21101)

FROM: Winston Lue, Environmental Engineer
Central District Office (5SCD0) *WL*

TO: Engineering Section (5AC)
ATTN: Hattie Geisler (5AC)
Willie H. Harris
THRU: Willie H. Harris, Chief
Central District Office (5SCD0)

On February 25, 1986, I conducted an air inspection as part of a multimedia inspection at this Federal Facility. The Illinois Environmental Protection Agency (IEPA) was notified of the inspection, but did not participate. Commander Wolcott represented the Glenview Naval Air Station (GNAS).

GNAS is a Naval Air training base used for training Navy Reserve personnel to fly helicopters and transport planes. The U.S. Coast Guard is also located at GNAS.

The Permittee has a boiler house in Building 4. There are four Keeler water tube boilers. The IEPA has issued an operating permit for these boilers. Two of the boilers are rated at 25,000 # steam per hour, one at 20,000 #/hour and the remaining boiler rated at 35,000 #/hour. These boilers appear to be the only emission sources at this Facility.

One of the two 25,000 #/hour boilers and the 20,000 #/hour boiler were in service at the time of inspection. The remaining boilers were on stand-by status. The steam generated from these boilers were used to heat the buildings. No visible emissions were seen at the time of inspection. The boilers do not have pollution control equipment to remove particulates since natural gas is used as the primary fuel for each boiler. Number two Fuel Oil can be used as an alternate fuel, however, it has not been used since 1973. Each boiler has its own stack.

The Permittee does not have a Fugitive Dust Prevention program, nor have they been required by the State to develop such a plan. There are no coal or raw materials stored on-site. Most of the roads are paved and are not wetted during dry weather season. No fugitive emissions were observed at time of this inspection.

If you have any questions regarding this report, please call me at 353-2750.

VISIBLE EMISSIONS REPORT

Source Identification

Facility: Glenview Naval Air Station

Source : Boiler house, Building 4

Regulation:

Evaluator's Report

During the stated periods of observation, the following sources appeared as shown:

Process or Source	25,000#/hr Steam boiler	35,000#/hr Steam boiler		
Date	2/25/86	2/25/86		
Obs. Time Start-End —T	9:30-10 AM	9:30-10 AM		
Estimated Range of Opacity	0	0		
Operating?	Yes	Yes		
Control Device(s)	None	None		
Emission Point	Stack	Stack		
Remarks	Natural gas as fuel.			

Name and Qualification of expert witness to attest to above:

Signature: Winston Lue

Name : WINSTON LUE

Title : ENVIRON

Office : CDO

Date of Last Certification: 10/85

MEMORANDUM

3 MAR 1986

Re: RCRA Inspection
Glenview Naval Air Station
Glenview, Illinois
IL3 170 022 930 (C28114)

From: Catherine A. McCord *CAM*
RCRA Enforcement

To: William Muno, Chief
RCRA Enforcement Section (SHE-12)

Thru: *Willie H. Harris*
Central District Office (SSCDO)

On February 25, 1986, U.S. EPA conducted an inspection of the Glenview Naval Air Station, Glenview, Illinois. The purpose of this inspection was to evaluate the facility's compliance with Federal and state hazardous waste regulations. This facility is an air training facility for the U.S. Naval Reserve.

In November 1980, the facility filed a Part A hazardous waste permit application for container storage. Hazardous waste is currently generated from maintenance and servicing operations. This facility does not currently generate a significant quantity of waste because of the nature and limited quantity of activity. I was told by plant personnel that waste is generally removed from the facility in less than 90 days, though this fact is not documented by the required paperwork. Waste is currently being transported by the facility to the Defense Property Deutilization Office, Great Lakes Station.

It may be advantageous for this facility to consider withdrawing its Part A permit application and go to Generator status. The facility is not currently in compliance with many TSD and generator requirements and eventual compliance with only generator regulations may be much easier. This facility may be a candidate for further enforcement activity because of the current RCRA violations.

Attached is a summary of the inspection findings and a completed Illinois EPA TSD inspection checklist.

Feel free to contact me at 886-1478, if you have any questions.

Attachments

8 MAR 1986

RCRA INSPECTION
GLENVIEW NAVAL AIR STATION
GLENVIEW, ILLINOIS
IL3 170 022 930 (C28114)

On February 25, 1986, a RCRA compliance inspection was performed at Glenview Naval Air Station, Glenview, Illinois, by Catherine McCord, RCRA Enforcement, U.S. EPA Region V. Illinois EPA declined to participate in the inspection. This facility is a training station for the Naval Reserve and is only in full operation from Wednesdays through Sundays, but a support staff is at the facility during the entire week. The Naval Station currently has Interim Status for container storage.

The Naval Air Station generates hazardous waste during aircraft and vehicle maintenance operations. The majority of waste is generated from spray paint booth operations and the purging and cleaning of spray lines. This paint and solvent mixture is accumulated in 55-gallon drums. Solvent waste is also generated in two small parts degreasing operations in the maintenance and hobby shops. Waste solvents include methyl ethyl ketone (MEK), toluene, xylene, and lacquer thinner. Waste solvents are accumulated in 5gallon and 10gallon containers.

When waste containers are full, they are moved into a fenced and locked area. Facility personnel explained that they transport waste to the Defense Property Deutilization Office (DPDO), Great Lakes Facility, Lake County, Illinois (312-688-3655). I was told that usually only one drum of material is allowed to accumulate, prior to shipment to DPDO and that shipments are made approximately four times per year. Four full 55gallon drums of paint/solvent waste were in the drum storage area, along with approximately 15 smaller waste containers marked spent 1,1,1-trichloroethane, lacquer thinner, and dry cleaning solvent (SD11). Personnel did not know where the dry cleaning solvent is being used or specifically what type of solvent it is. Two orange 55gallon drums were laying on their sides in a drum rack, with funnels in their open bungs. This waste material could not be identified by facility personnel.

The following is a general summary of the violations noted during the inspections:

-Waste containers are not properly labeled prior to shipment.

- Shipments of waste to DPDO are not manifested. It is not known whether DPDO has a permit to take offsite waste.
- Shipments of waste are not made by a registered hazardous waste transporter.
- Inspection of containers are not performed.
- Operating and inspection logs are not maintained. Documentation on length of waste accumulation is not maintained.
- No training related to hazardous waste management is performed.
- Job titles and descriptions are not maintained.
- Annual reports are not submitted to Illinois EPA.
- A closure plan and contingency plan have not been developed.
- The facility does not have waste analysis or a waste analysis plan.
- The storage area does not have the required signs.
- Waste containers were not being stored closed.
- The waste container bungs were removed and sitting on top of their respective containers.

The facility currently has a 10,000 underground concrete tank for the storage of waste oil. According to facility personnel, no material other than waste oil is placed in this tank. A total of 2,000 gallons of waste oil is pumped from the tank twice a year. The facility is preparing to award a contract to test and inspect their numerous underground fuel storage tanks. I suggested that the waste oil tank be inspected and tested as part of the same program.

The facility is currently trying to obtain funding for the development of a "hazardous waste management plan". It appears that this plan would involve an audit of the facility and the development of a waste management strategy and required written plans. The facility contact was not very optimistic about the funding of this project.

It is not known whether this facility has any solid waste management units.

ILLINOIS
RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
TREATMENT, STORAGE, AND DISPOSAL FACILITIES
Form A General Facility Standards

I. General Information

USEPA Number: 1 L 3-170-022-930 IEPA Number: _____
 Major Facility: YES/NO Notified As: TSD Regulated As: _____
 (A) Facility Name: U.S. NAVY - GLENVIEW NAVAL AIR STATION
 (B) Street: NAVAL AIR STATION
 (C) City: GLENVIEW (D) State: IL (E) Zip Code: 60026
 (F) Phone: (312) 657-2229 (G) County: COOK
 (H) Operator: U.S. NAVY -
 (I) Street: SAME
 (J) City: _____ (K) State: _____ (L) Zip Code: _____
 (M) Phone: _____ (N) County: _____
 (O) Owner: U.S. NAVY
 (P) Street: SAME
 (Q) City: _____ (R) State: _____ (S) Zip Code: _____
 (T) Phone: _____ (U) County: _____

Region: V (V) Date of Inspection: 2 / 25 / 86 (W) Time: (From) 9:00 (To) 4:15

Type of Inspection: ☒ ISS ☐ RECORD REVIEW ☐ SAMPLING ☐ CITIZEN COMPLAINT
☐ CLOSED ☐ WITHDRAWAL ☐ OTHER ☐ PART B
 F/U _____ / _____ / _____ (Date of Initial Inspection)

(X) Weather Conditions: SUNNY 28° F

Area	Section

Class I	Class II

(AA) Preparer Information

Name
CATHERINE MCCORD

Agency/Title
U.S. EPA - REGION V

Telephone
(312) 886-1478

TOTAL Class I's & II's

III. GENERAL FACILITY STANDARDS:
(Part 265 Subpart B)

N/A = NOT APPLICABLE

Yes No NI* Remark

(A) Has the Regional Administrator been notified regarding:

1. Receipt of hazardous waste from a foreign source? N/A

2. Facility expansion? N/A

(B) General Waste Analysis: NO WASTE ANALYSIS / NO WASTE ANALYSIS PLAN

1. Has the owner or operator obtained a detailed chemical and physical analysis of the waste? X

2. Does the owner or operator have a detailed waste analysis plan on file at the facility? X

3. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site? X

(C) Security - Do security measures include:
(if applicable)

1. 24-Hour surveillance? X

2. Artificial or natural barrier around facility? X

3. Controlled entry? X

4. Danger sign(s) at entrance? X

(D) Do Owner or Operator Inspections Include:

NO OPERATING RECORD

1. Records of malfunctions? X

2. Records of operator error? X

3. Records of discharges? X

*Not Inspected

IV. PREPAREDNESS AND PREVENTION:
(Part 265 Subpart C)

(A) Maintenance and Operation
of Facility:

Is there any evidence of fire,
explosion, or release of
hazardous waste or hazardous
waste constituent?

Yes No NI* Remarks

— X —

(B) If required, does the facility
have the following equipment:

1. Internal communications or
alarm systems?

X — —

2. Telephone or 2-way radios
at the scene of operations?

X — —

3. Portable fire extinguishers,
fire control, spill control
equipment and decontamination
equipment?

— X —

EQUIPMENT AVAILABLE,
BUT NOT IN NEARBY
LOCATION

Indicate the volume of water and/or foam available for fire control:

(C) Testing and Maintenance of
Emergency Equipment:

1. Has the owner or operator
established testing and
maintenance procedures
for emergency equipment?

— X —

FIRE EXTINGUISHERS
ARE TESTED

2. Is emergency equipment
maintained in operable
conditions?

— X —

(D) Has owner or operator provided
immediate access to internal
alarms? (if needed)

X — —

*Not Inspected

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES - Continued

	Yes	No	NI*	Remarks
(B) Are copies of the Contingency Plan available at site and local emergency organizations?	—	<u>X</u>	—	
(C) Emergency Coordinator				
1. Is the facility Emergency Coordinator identified?	—	<u>X</u>	—	NO DESIGNATED EMERGENCY COORDINATOR RELATED TO HAZARDOUS WASTE
2. Is coordinator familiar with all aspects of site operation and emergency procedures?	—	<u>X</u>	—	
3. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	—	<u>X</u>	—	
(D) Emergency Procedures				
If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?	—	<u>X</u>	—	NO CONTINGENCY PLAN TO IMPLEMENT

VI. MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING (Part 265 Subpart E)

	Yes	No	NI*	Remarks
(A) Use of Manifest System				
1. Does the facility follow the procedures listed in §265.71 for processing each manifest?	—	<u>X</u>	—	No manifests for hazardous waste, WHICH IS TRANSPORTED TO DEFENSE PROPERTY DEUTILIZATION OFFICE - GREAT LAKES
2. Are records of past shipments retained for 3 years?	—	<u>X</u>	—	
(B) Does the owner or operator meet requirements regarding manifest discrepancies?	—	<u>X</u>	—	

*Not Inspected

Section G - CLOSURE AND POST CLOSURE (Part 725, Subpart G)

NO. CLOSURE PLAN

YES NO NI Remarks

1. Closure

a. Is the facility closure plan available for inspection?

___ X ___

b. Has the closure plan been submitted to the Director?

___ X ___

c. Has closure begun?

___ X ___

*2. Post-Closure: Is the post closure plan available for inspection?

___ N/A ___

* Applies only to disposal facilities.

VII. CLOSURE AND POST CLOSURE (Part 265 Subpart G)

Yes	No	NI*	Remarks
-----	----	-----	---------

(A) Closure and Post Closure

- 1: Is the facility closure
plan available for inspection
by May 19, 1981?

2. Has this plan been submitted to the Regional Administrator

— X —

- ### 3. Has closure begun?

— X —

4. Is closure estimate available by May 19, 1981?

X

(B) Post closure care and use of property

Has the owner or operator supplied
a post closure monitoring plan?
(effective by May 19, 1981)

N/A

VIII. FACILITY STANDARDS

(Part 265, Subparts I thru R)

I USE AND MANAGEMENT OF CONTAINERS

Facility Name: GLENVIEW NAVAL AIR STATION Date of Inspection: 2-25-86

Yes	No	NI*	Remarks
-----	----	-----	---------

1. Are containers in good condition?

2. Are containers compatible with waste in them?

X _ _

- 3. Are containers stored closed?**

 X

4. Are containers managed to prevent leaks?

 X

5. Are containers inspected weekly for leaks and defects?

6. Are ignitable & reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive.)

X

BUNGS OF 55-GALLON AND
SOME 10-GALLON CONTAINERS
REMOVED AND PLACED ON T

SMALLER CONTAINERS (5 + 10-GALLON)
ARE STORED IN HAPHAZARD FASHES

NO INSPECTION

Yes No NI* Remarks

8. Has the owner or operator observed the National Fire Protection Association's buffer zone requirements for tanks containing ignitable or reactive wastes? N/A

Tank capacity: _____ gallons

Tank diameter: _____ feet

Distance of tank from property line _____ feet

(See table 2 - 1 through 2 - 6 of NFPA's "Flammable and Combustible Liquids Code - 1977" to determine compliance.)

K
SURFACE IMPOUNDMENTS

N/A

Facility Name: _____

Date of Inspection: _____

1. Do surface impoundments have at least 60 cm (2 feet) of freeboard?
2. Do earthen dikes have protective covers?
3. Are waste analyses done when the impoundment is used to store a substantially different waste than before?
4. Is the freeboard level inspected at least daily?
5. Are the dikes inspected weekly for evidence of leaks or deterioration?
6. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a surface impoundment? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)
7. Are incompatible wastes stored in different impoundments? (If not, the provisions of 40 CFR 265.17(b) apply.)

_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

M
LAND TREATMENT

N/A

Facility Name: _____

Date of Inspection: _____

1. Is treated hazardous waste capable of biological or chemical degradation?

2. Are run-off and run-on diverted from the facility or collected? (Effective date: November 19, 1981)?

3. Is waste analyzed according to 265.273?

4. If food chain crops are grown at the facility, has the owner or operator addressed the requirements of 265.276?

5. Is an unsaturated zone monitoring plan designed and implemented to detect the vertical migration of hazardous waste and provide information on the background concentrations of the hazardous waste available?

6. Does the unsaturated zone monitoring plan address the minimum information specified in 265.278?

7. Are records kept regarding application dates and rates, quantities, and locations, of all hazardous waste placed in the facility?

8. Are the special requirements fulfilled regarding land treatment of ignitable or reactive wastes? (Indicate if waste is ignitable or reactive.)

9. Are incompatible wastes land treated? (If yes, 265.17(b) applies)

N/A

	Yes	No	NI*	Remarks
(If waste is rendered non-reactive or non-ignitable see treatment requirements) If not, the provisions of 40 CFR 265.17(b) apply.	—	—	—	—
(E) Special Requirements for Incompatible Wastes.				
Does the owner or operator dispose of incompatible wastes in separate cells?	—	—	—	—
If not, the provisions of 40 CFR 265.17(b) apply.	—	—	—	—
(F) Special requirements for liquid waste (effective 11-19-81)				
1. Are bulk or non-containerized liquids placed in the landfill?	—	—	—	—
2. Does the landfill have a chemically and physically resistant liner system?	—	—	—	—
3. Does the landfill have a functional leachate collection system?	—	—	—	—
4. Are free liquids stabilized prior to or immediately after placement in the landfill?	—	—	—	—
(G) Special requirements for Containers (effective 11-19-81)				
Are empty containers crushed flat, shredded, or similarly reduced in volume before being buried beneath the surface of the landfill?	—	—	—	—

IV. Open Burning

A. Only complete this part if the facility open burns hazardous waste.

N/A

- | | Yes | No | NI* | Remarks |
|---|-----|----|-----|---------|
| 1. Does this facility burn <u>only</u> waste explosives?
(A <u>No</u> answer means <u>other</u> hazardous waste is open-burned.) | — | — | — | |
| 2. If this facility open-burns waste explosives, does it burn the waste at a distance greater than or equal to the minimum specified distance (below) | — | — | — | |

Pounds of waste explosives or propellants	Minimum distance from open burning or detonation to the property of others	
0 to 100.....	204 m	670 ft
101 to 1,000.....	380 m	1,250 ft
1,001 to 10,000.....	530 m	1,730 ft
10,0001 to 30,000.....	690 m	2,260 ft

Q

CHEMICAL, PHYSICAL and BIOLOGICAL TREATMENT

Facility Name: _____

Date of Inspection: _____

- | | Yes | No | NI* | Remarks |
|---|-----|----|-----|---------|
| 1. Is equipment used to treat only those wastes which will not cause leakage, corrosion, or premature failure? | — | — | — | |
| 2. Is a continuously fed system equipped with a means of hazardous waste inflow stoppage or control (e.g., cut-off system?) | — | — | — | |

*Not Inspected

	Yes	No	NI*	Remarks
3. Has the owner or operator addressed the waste analysis requirements of 265.402?	—	—	—	—
4. Are inspection procedures followed according to 265.403?	—	—	—	—
5. Are the special requirements fulfilled for ignitable or reactive wastes?	—	—	—	—
6. Are incompatible wastes treated? (If yes, 265.17(b) applies.)	—	—	—	—

N/A

Note: EPA has temporarily suspended the applicability of the requirements of the hazardous waste regulations in 40 CFR Parts 122, 264 and 265 to owners and operators of (1) wastewater treatment tanks that receive, store, and treat wastewaters that are hazardous waste or that generate, store or treat a wastewater treatment sludge which is a hazardous waste where such wastewaters are subject to regulation under Sections 402 or 307(b) of the Clean Water Act (33 U.S.C. 1251 et seq.) and (2) neutralization tanks, transport vehicles, vessels, or containers which neutralize wastes which are hazardous only because they exhibit the corrosivity characteristic under 40 CFR §261.2 or are listed as hazardous wastes in Subpart D of 40 CFR Part 261 only for this reason.

IX

Complete this section if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

1. MANIFEST REQUIREMENTS

	Yes	No	NI*	Remarks
(A) Does the operator have copies of the manifest available for review?	—	X	—	—
(B) Do the manifest forms reviewed contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements)				
1. Manifest document number?	—	—	—	NO MANIFESTS AVAILABLE
2. Name, mailing address, telephone number, and EPA ID Number of Generator	—	—	—	11

Omit Section 3 if the facility has interim status and its Part A permit application describes storage

NOTE: * FACILITY DID APPLY FOR INTERIM STATUS, BUT IS NOT CURRENTLY
3. On Site Accumulation

	Yes	No	NI*	Remarks
STATUS STORAGE REQUIREMENTS OR LESS THAN 90-DAY STORAGE REQUIREMENTS				
1. Are containers marked with start of accumulation date?	_____	_____	_____	_____
2. Are the containers of hazardous waste removed from installation before they can accumulate for more than 90 days?	_____	_____	_____	_____
3. Are wastes stored in containers managed in accordance with 40 CFR Part 265.174 and 265.176 (weekly inspections of containers, containers holding ignitable or reactive wastes located at least 15 meters (50 Feet) from facility's property line?	_____	_____	_____	_____
4. If wastes are stored in tanks, are the tanks managed according to the following requirements?				
a. Are tanks used to store only those wastes which will not cause corrosion leakage or premature failure of the tank?	_____	_____	_____	_____
b. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, dikes, or other containment structures?	_____	_____	_____	_____
c. Do continuous feed systems have a waste-feed cutoff?	_____	_____	_____	_____
d. Are required daily and weekly inspections done?	_____	_____	_____	_____
e. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? (If waste is rendered non-reactive or non-ignitable, see treatment requirements?	_____	_____	_____	_____
f. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR §265.17(b) apply)	_____	_____	_____	_____

X
TRANSPORTER REQUIREMENTS
40 CFR Part 263

Complete this Section if the owner or operator transports hazardous waste.

I. MANIFEST SYSTEM AND RECORDKEEPING
(Subpart B)

	Yes	No	NI*	Remarks
Are copies of the completed manifests or shipping paper(s) available for review and retained for three years?	—	<u>X</u>	—	_____

II. INTERNATIONAL SHIPMENTS

A. Does the transporter record on the manifest the date the waste left the U.S.?	—	—	—	N/A
B. Are signed completed manifest(s) on file?	—	—	—	↓

V. MISCELLANEOUS

A. Does transporter transport hazardous waste into the U.S. from abroad?	—	<u>X</u>	—	N/A
B. Does the transporter mix hazardous waste of different DOT shipping descriptions by placing them into a single container?	—	—	—	UNKNOWN

NOTE: If (A) or (B) were answered "Yes" then the Transporter is also a Generator and must comply with the Generator regulations.

*Not Inspected

MEMORANDUM

3 MAR 1986

Re: RCRA Inspection
Glenview Naval Air Station
Glenview, Illinois
IL3 170 022 930 (C28114)

From: Catherine A. McCord *CAC*
RCRA Enforcement

To: William Muno, Chief
RCRA Enforcement Section (5HE-12)

Thru: *Willie H. Harris*
Central District Office (5SCDO)

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